## UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

IN RE: VALSARTAN, LOSARTAN, AND

MDL NO. 2875

IRBESARTAN PRODUCTS LIABILITY LITIGATION.

HON. ROBERT B. KUGLER

THIS DOCUMENT RELATES TO ALL ACTIONS

## NOTICE OF VIDEOTAPED DEPOSITION OF PLAINTIFF MICHAEL SVEBEK

PLEASE TAKE NOTICE that, in accordance with Rule 30 of the Federal Rules of Civil Procedure and the Fact Witness Deposition Protocol in this case (Case Management Order No. 20, Dkt. 632), Defendant Torrent Pharma, Inc. and Torrent Pharmaceuticals, Ltd. ("Torrent") will take the deposition upon oral examination of Michael Svebek on August 24, 2021 at 9:00 a.m. CST at 29 R. Price Road, Deville, LA, 71328.

Please take further notice that: the deposition will be conducted remotely, using audio-visual conference technology; the court reporter will report the deposition from a location separate from the witness; counsel for the parties will be participating from various, separate locations; the court reporter will administer the oath to the witness remotely; and the witness will be required to provide government-issued identification satisfactory to the court reporter, and this identification must be legible on camera. The deposition shall be videotaped and recorded stenographically, and will continue from day to day until completed before a person duly authorized to administer oaths who is not counsel of record or interested in the events of this case.

The attorney contact for the deposition and lead questioner is:

Brittney Nagle Kirkland & Ellis LLP 601 Lexington Ave New York, NY 10022 212-390-4210 brittney.nagle@kirkland.com

Date: August 12, 2021 Respectfully submitted,

s/ Brittney M. Nagle
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Attorney for Defendant Torrent Pharma, Inc. and Torrent Pharmaceuticals, Ltd.

## **CERTIFICATE OF SERVICE**

I hereby certify that on this 12th day of August 2021 a true and correct copy of the Notice of Videotaped Deposition of Plaintiff Michael Svebek was served upon all counsel of record via CM/ECF.

s/ Brittney M. Nagle
Brittney M. Nagle